

EXHIBIT 2

Chang, Esther Kim

From: John McCauley <johnmccauley@quinnemanuel.com>
Sent: Wednesday, August 02, 2017 7:56 PM
To: UberWaymoMoFoAttorneys; BSF_EXTERNAL_UberWaymoLit; DG-GP Otto Trucking Waymo
Cc: QE-Waymo
Subject: Waymo v. Uber - Droz 30(b)(6) Designations and Objections

- External Email -

Counsel,

Waymo designates Mr. Droz to testify on Topics 2 and 6 of Uber's First 30(b)(6) Notice to Waymo. Waymo objects to Topic 6 on the ground that it is compound and contains multiple subparts in violation of Judge Alsup's Standing Order limiting the number of subject matters for 30(b)(6) depositions. Waymo further objects to Topic 6 on the ground that the phrases "valuation, use and/or commercialization" and "investments and expenditures made to develop" are vague and overbroad and do not describe the testimony sought with "reasonable particularity" as required by Judge Alsup's Standing Order as it relates to 30(b)(6) topics. Accordingly, with respect to Topic 6, he will testify regarding the design and use of the circuits related to the development of the '936 patent in Waymo's LiDAR.

Waymo designates Mr. Droz to testify with regard to topics 9 and 10 of Uber's Second 30(b)(6) Notice to Waymo for the currently asserted Trade Secrets, except for TS 25. For TS 25, Waymo will designate a different witness. Waymo objects to Topic 9 on the ground that the request for testimony as to "any documents that reflect such development" is overbroad and vague, and does not comply with Judge Alsup's Standing Order as it relates to 30(b)(6) topics. Accordingly, for Topic 9, Mr. Droz will be designated on the development of the Asserted Trade Secrets (other than TS25), but not on "any documents" that reflect the development.

Waymo designates Mr. Droz to testify on Topics 9 and 10 of Otto Trucking's 30(b)(6) Notice to Waymo with respect to the currently asserted Trade Secrets, except for TS 25 as noted above. Waymo objects to Topic 10 on the ground that it is compound and contains multiple subparts in violation of Judge Alsup's Standing Order limiting the number of subject matters for 30(b)(6) depositions. Waymo further objects to Topic 10 on the ground that the request for testimony concerning the compliance or noncompliance by current or former employees or vendors of all measures taken by Google and/or Waymo to protect its trade secrets is patently overbroad and vague and does not describe the testimony sought with "reasonable particularity" as required by Judge Alsup's Standing Order as it relates to 30(b)(6) topics. Waymo similarly objects to the request for testimony concerning "whether such employees or vendors took LiDAR home to work on or as mementos" as improper under Judge Alsup's Standing Order because it is not directed at discovering percipient facts in the possession of Waymo. Accordingly, with respect to Topic 10, Mr. Droz will testify on Waymo's practices and policies for protecting trade secrets Waymo claims were misappropriated by Otto Trucking.

Regards,

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